

In RM-10783 before The Commission, petitioner Mr. Holliday presents several arguments in his request that modify the Amateur Radio Service rules to remove all requirements for knowledge of Morse code". In one of his arguments, Mr. Holliday notes that he is "well versed in the use of Morse code and for many years operated CW exclusively". If the Commission were to eliminate the current Morse requirement, valued, skilled, and well-rounded operators like Mr. Holliday could become a rarity.

Mr. Holliday has presented a number of unsubstantiated arguments in support of his request.

The argument that the Morse Code is a skill that is unavailable to those with physical or other handicaps is unsubstantiated in Mr. Holliday's petition. The Commission has made it clear that examiners should make every accommodation to examinees with disabilities. It is incumbent upon the petitioner to offer evidence that this condition exists and further that the Commission has not already adequately addressed such issues.

Mr. Holliday has asserted that Morse code use has "declined in other services", by which I assume in the Commercial services. I believe that a change in technology in the Commercial services should have little bearing on the Amateur Service. The Amateur Service has the mandate to serve in the interest of the public and has been developed to further a cadre of trained radio operators. Our interests are far different from the Commercial services, and should remain so.

Mr. Holliday suggests that "The Morse code requirement limits the number of people who take advantage of the Amateur Radio hobby", yet the Commission has established the Technician Class License, permitting a broad spectrum of participation in many of the popular modes. I would venture a guess that almost all new Amateur's start with this license class and are active in VHF communications, public service, and even communications with space stations. Morse Code is not a requirement for this license.

Finally, Mr. Holliday paints a broad brush with his statement that "Continued Morse code requirements serve no useful purpose in the Twenty-first Century".

I believe The Commission, as I pointed out in my affirmative comments to RM-10781, has "an obligation in its regulating duties as to the broader implications of its rules and how they effect the development of this Service". I believe there is a "useful purpose" for the Morse Code requirement in the Twenty-first Century.

Our nation has lost many challenges that would make us a better people. We now fear sending humans to space because the real danger of this work has been brought home to us. We fear collaboration which will involve a flexibility of our positions, and instead replace it with confrontation and war. We weaken standards that have brought challenge and when met - accomplishment - simply because they are difficult. The famous words of President Kennedy have been twisted - We make it easy, because it is hard. I encourage the Commission to deeply consider the broader implications of removing this simple requirement and reject RM-10783.

The Morse skill is maintained by Amateur Radio operators through contesting, "rag chewing", and the active maintenance of the American Radio Relay League's National Traffic System, in which I participate regularly. We have already seen how Amateur Radio supplanted the domestic telephone and mobile phone services

during the recent Northeast power failure. Further erosion of domestic communications systems will likely press all modes of communications into service, including the use of Morse code. Having operators with Morse knowledge will strengthen, not weaken, the Amateur service and assure the continuation of an old, but valuable resource.

RM-10783 should be rejected and I believe the Commission would do well to consider RM-10781 which does not eliminate the Morse requirement, but instead grants HF privileges to Technician Class licensees. The licensing upgrade incentive will remain, a "practice area" for development of Morse skills will be created, and this valuable challenge will remain a component of the Amateur Service.

The Amateur community often refers to "The Radio Arts". Technical skill, operating proficiency, diligence in maintaining a legally operating station, are not the only practices of Amateur Radio. Removing the Morse requirement will weaken the "Art", and in the long term, further erode the Heart of the Amateur Service.

Respectfully,

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